

# WRANGELL COOPERATIVE ASSOCIATION

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Regional Freedom of Information Officer  
U.S. EPA, Region 10  
Office of Ecosystems, Tribal and Public Affairs  
1200 6th Avenue ETPA-124  
Seattle, WA 98101

Re: Freedom of Information Act Request

Dear Regional Freedom of Information Officer:

This is a request under the Freedom of Information Act.

I request that a copy of the following documents [or documents containing the following information] be provided to the Wrangell Cooperative Association (WCA) related to the Wrangell (Byford) Junkyard Clean-up and the Wrangell Junkyard Monofill Repository Project: papers, files, accounts, writings, including drafts and memorializations of conversations, and other items, regardless of format or physical characteristics, that are developed or received by the U.S. Environmental Protection Agency (EPA), or by a private contractor for the EPA, and that are preserved for their informational value.

This includes, but is not limited to:

- All financial documents relating to the Byford Junkyard Clean-up and Monofill Repository Project.
  - We would appreciate receiving this information as soon as possible, with all other documentation to follow.
- Any documentation or information exchange between the EPA and any government or state entity, agency, business or individual related to the Byford Junkyard Clean-up and Wrangell Monofill Repository Project.

For reference, attached is a letter from Kristin Ryan, Director of ADEC to Sheryl Bilbrey, Director of EPA Region 10. It references the EPA's role in the project, including "environmental assessment work early on, to a Targeted Brownfield Assessment that spurred the cleanup effort, and now the monofill repository design package."

In order to help determine our status to assess fees, you should know that the WCA is a federally recognized Tribe incorporated April 30, 1942 under Section 16 of the Indian Reorganization Act of 1934, as amended for Alaska in 1936.

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I request a waiver of all fees for this request. Disclosure of the requested information to the WCA Tribe is in the public interest, because it is likely to contribute significantly to Tribal and public understanding of the operations and activities of the EPA and is not in Tribal commercial interest. This request is based on the fact that construction of a lead contaminated repository adjacent to sites currently and traditionally used by Tribal citizens for vital subsistence activities is a cause of much concern for the Tribe.

Requested documents may be mailed via zip drive or emailed to [wcatrbe@gmail.com](mailto:wcatrbe@gmail.com), [igapchris.wca@gmail.com](mailto:igapchris.wca@gmail.com), and [igaptech.wca@gmail.com](mailto:igaptech.wca@gmail.com).

Thank you for your consideration of this request. I may be contacted at the above information with any questions.

Sincerely,



Richard Oliver

Wrangell Cooperative Association Board President

CC: Sheryl Bilbrey, Director, U.S. Environmental Protection Agency, Region 10  
Wally Moon, Manager, U.S. Environmental Protection Agency Region 10

Encl: July 7, 2017 DEC to EPA Letter



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Director's Office

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July 7, 2017

Sheryl Bilbrey, Director  
Office of Environmental Cleanup  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Re: Wrangell Monofill Repository

Dear Ms. Bilbrey:

The Alaska Department of Environmental Conservation (ADEC) is in receipt of the Design Package for the Wrangell Junkyard Repository Site completed June 9, 2017 by EPA's contractor, Ecology and Environment, Inc. Submission of this design concludes EPA's contribution to the Wrangell Junkyard contaminated site project.

Project Background

In February 2016, DEC and its contractors initiated an emergency response cleanup action at a former junkyard property known as the Wrangell (Byford) Junkyard located at mile 4 Zimovia Highway in Wrangell, Alaska. The junkyard property is on City and Borough of Wrangell property accessible by road. The primary contaminant of concern was lead in soil. The cleanup was completed at the end of July 2016. The cleanup action consisted of excavation, screening, EcoBond-stabilization, and stockpiling of approximately 18,500 cubic yards of soil heavily contaminated with lead. All oversize rock, debris, and hazardous waste was separated from the material and disposed off-site.

The stockpiled soil is temporarily stored on the Junkyard site in a securely lined and covered containment cell. The soil was treated with a reliable and tested product called EcoBond, which utilizes phosphate to neutralize the solubility of lead in the soil to sharply reduce its ability to leach into water. Toxicity Characteristic Leaching Procedure (TCLP) and Synthetic Precipitation Leaching Procedure (SPLP) tests were conducted on the treated soil and results confirmed that lead does not leach. Although no longer a RCRA regulated hazardous waste, lead is still present in the material that qualify it as polluted soil under State regulation. If consumed by humans, plants, or animals, the



lead may have some bioavailability that is potentially toxic. As a result, DEC has determined that encapsulating the material into a capped monofill will limit these exposures as the treated material has been confirmed to meet DEC's regulatory criteria for disposal in an unlined, solid waste monofill under the solid waste regulations 18 AAC 60. Construction of the monofill will occur at a site on state-owned land accessible by the Wrangell road system.

#### Monofill Construction

DEC has issued a Project Request for Proposals (PRFP) for construction of the monofill repository and is currently in contract negotiations with the winning term contractor. In addition, DEC is in the process of issuing a second PRFP for engineering inspection services to select a firm to carry out the construction oversight and inspection work necessary to ensure the monofill is constructed to the specifications outlined in the E&E Design Package for the Wrangell Junkyard Repository Site. The Design Package will serve as the work plan for the project. Upon project completion, the engineer will prepare a final project report that will include preparing complete Record Drawings as specified in Section 017839 Project Record Documents of the Design Package.

Following project closeout, DEC or the appropriate state agency will perform future operation and maintenance of the permanent repository, dependent upon funding from the Alaska legislature. These activities are planned to include installation and maintenance of site controls and monitoring as required by 18 AAC 60 solid waste regulations to ensure the monofill cap is performing as intended.

We want to express our sincere gratitude for EPA's contribution to this project. From environmental assessment work early on, to a Targeted Brownfield Assessment that spurred the cleanup effort, and now the monofill repository design package which will bring the project to completion, EPA's role has been invaluable. We thank you and look forward to continued cooperation on contaminated site issues in Alaska in the future.

Sincerely,



Kristin Ryan  
Director

cc: Wally Moon, Manager, Spill Prevention and Removal Unit  
Jeff Fowlow, On-Scene Coordinator, Spill Prevention and Removal Unit.  
Jennifer Roberts, Program Manager, Contaminated Sites Program  
Sally Schlichting, Unit Manager, Contaminated Sites Program